

SEP 23 1999

1337

TPPA

Tuolumne Public Power Agency

2 South Green Street
Sonora, CA 95370
Phone (209) 533-5511
Fax (209) 533-5510

September 20, 1999

Mr. Rick Breitenbach
CALFED Bay-Delta Program
1416 Night Street, Suite 1165
Sacramento, CA 95814

RE: Draft Programmatic EIS/EIR

Dear Mr. Breitenbach:

The Tuolumne Public Power Agency (TPPA) is a Joint Powers Agency consisting of 30 public entities in Tuolumne County, formed for the purpose of obtaining First Preference Power from the Central Valley Project and using it for its facilities. We have reviewed the Draft Programmatic Environmental Impact Statement/Report (DPEIS) for the CALFED Bay-Delta Program and are presenting the following comments:

Impacts to CVP Power Resources. The preferred alternative would reduce average annual energy available for sale by 1,235 GWh, or by one-third. The worst case scenario (Alternative 3) would reduce average annual energy by 1,671 GWh, or almost one-half. These are severe impacts on Western customers, especially agencies like ours who rely entirely on Western power for our resources. The DEIS does not discuss realistic mitigation measures that would relieve us of these overwhelming impacts. Of course, there are other power sources, but at what cost and what other environmental impacts? The PEIS must analyze feasible mitigation measures that deal with economic consequences as well as impacts to water quality, air quality and the myriad of land use impacts.

CALFED Program Cost Allocations. Power revenue, whether from CVP or from SWP, must not be counted on to support new CALFED Program costs. Power is already supporting the Program through the CVPIA Restoration Fund. Allocating additional Program costs to power will only compound anticipated rate impacts.

We thank you for the opportunity to provide these comments and hope that they will be seriously considered in the development of the Final PEIS.

Sincerely,



Dominic N. Salluce
Agency Coordinator